



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue  
Seattle, WA 98101

March 17, 2008

Reply To

Attn Of: ETPA-088

Ref.: 03-008-NPS

Peter Dederich, Superintendent  
San Juan Island National Historical Park  
P.O. Box 429  
Friday Harbor, WA 98250

Dear Mr. Dederich:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft General Management Plan (GMP) and Environmental Impact Statement (EIS) for **San Juan Island National Historical Park** (CEQ No. 20080014) in San Juan County, WA. Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we also evaluate the document's adequacy in meeting NEPA requirements.

The draft GMP/DEIS evaluates the impacts of a National Park Service (NPS) proposal to update a 1979 management plan for the park and respond to changed conditions within the park since then. This GMP/DEIS describes and analyzes the potential impacts from three alternative actions (A-C) proposing management strategies for resource protection and preservation, education and interpretation, visitor use and facilities, land protection and boundaries, long-term operations and management of the park. This GMP would last 15-20 years.

Under No Action Alternative (Alternative A), existing management strategies and trends at the Park would continue without change. Under Alternative B, the NPS would increase visitor opportunities and outreach through additional visitor facilities, recreational opportunities, programs, and services. Natural and cultural resources interpretation would be enhanced; the road system would be reconfigured to include existing historic road alignment where possible; the Crook house would be renovated; and at the American Camp, the 1979 double-wide trailer would be removed, the site restored to natural conditions, and a new enlarged visitor center would be built. The cultural landscapes would be enhanced to aid visitor understanding and interpretation through a variety of techniques. The prairie would be restored to native plant species.

The **Preferred Alternative** (Alternative C) would broaden the scope of resource management and interpretation programs to emphasize the connections and interrelationships between the park's natural and cultural resources. At English Camp, the Crook house would be stabilized and the hospital would be rehabilitated and opened to the public for interpretation.



The 1979 double-wide trailer would be replaced with a larger and permanent visitor center. A collections study room for natural and cultural resource items would also be relocated to the park. There would be more buildings open to the public for interpretation as well as research and academic studies. Off-island interpretation would be enhanced through partnerships. As in Alternative B, the existing road to the redoubt off Pickett's Lane would be converted to a trail and the prairie would be restored to native plant species. The NPS would also extend current park boundaries at English and American camps to include parcels now owned by Washington State, Bureau of Land Management (BLM), and private landowners.

The two action Alternatives (B and C) would result in varying degrees of effects to park resources, with most impacts being associated with proposed construction activities. Overall, however, the Preferred Alternative would afford park resources a higher degree of protection than Alternative B, especially after application of proposed mitigation measures to offset construction impacts. As a result, NPS believes that implementation of the Preferred Alternative would result in more beneficial than adverse impacts to park resources (p. 74-75).

As presented, the GMP/DEIS would serve as a good comprehensive planning framework that can be used as a basis and context for making decisions about more detailed resource and visitor use management actions. We also understand that detailed individual project plans will be subject to separate NEPA analysis and subsequent public review.

We are pleased that NPS plans to develop new facilities using sustainable designs to conserve resources. We also appreciate that climate change considerations were taken into account in the DEIS.

We support many of the proposed actions under the Preferred Alternative which are designed to develop desired conditions for protecting park resources and improve visitor usage. However, the final GMP/EIS would be improved if it included additional information as explained in our comments that follow.

### **Water resources**

Water quality degradation is one of EPA's primary concerns. Section 305(b) of the Clean Water Act (CWA) requires that the quality of all waterbodies be characterized, while section 303(d) of the same act requires each state to identify waterbodies that do not meet water quality standards. The GMP/EIS analysis should therefore disclose which waters may be impacted by the proposed action, the nature of potential impacts, and specific pollutants likely to impact those waters. It should also report those water bodies potentially affected by the project that are listed on the State's most current EPA approved 303(d) list. Antidegradation provisions of the CWA apply to those waterbodies where water quality standards are currently being met.

The GMP/DEIS indicates that drinking water at the park is drawn from wells located in the park and an outside source (p. 184). The 1996 amendments to the Safe Drinking Water Act (SDWA) require federal agencies to protect sources of drinking water for communities. Source water is untreated water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. Groundwater extraction, land disturbance, material storage, waste disposal, inadvertent chemical or hazardous liquid spills, and compaction produced by vehicular traffic can all affect recharge to the park aquifer and groundwater quality.



### *Recommendations*

The final GMP/EIS should include information about State water quality standards and clarify that individual projects would be designed to assure that applicable water quality standards would be met throughout the life of the projects. If waters in or near the park do not meet water quality standards and the Washington Department of Ecology (Ecology) has developed restoration plans for them, we recommend that the NPS coordinate with the Ecology as such plans are implemented. If plans to restore water quality have not yet been established for impaired waterbodies, then we recommend that the NPS coordinate with Ecology as the plan is developed. Also, the GMP/EIS should demonstrate that there will be no net degradation of water quality in waters where water quality standards are currently being met.

Under the CWA, any construction project disturbing a land area of one or more acres requires a stormwater National Pollutant Discharge Elimination System (NPDES) permit. In keeping with NPS's intent to use sustainable design, we encourage use of Low Impact Development (LID) techniques that reduce the volume of stormwater and mimic natural conditions as closely as possible. For example, LID techniques would lessen the impacts of stormwater runoff from impervious surfaces such as paved parking lots, roads and roofs.

Because of the potential for construction, operation and maintenance activities to impact groundwater, we recommend that NPS include information about the present quality of drinking water in the park, potential adverse effects that could result from activities, and measures that would be taken to protect drinking water in the park.

### **Air quality**

The GMP/DEIS indicates that air quality within the park is generally good and that the park has been designated Class II airshed. Air quality may be impacted in the short term due to construction of new and use of access roads, prescribed fire to manage cultural landscapes, herbicide applications to treat invasive plant species, and in the longer term due to traffic on dirt roads, emissions from vehicles and on-site operations, and cumulative impacts from surrounding activities such as agriculture and fire. The GMP/DEIS proposes construction of a new visitor center, use of prescribed fire to manage landscapes and herbicides to treat invasive plants species, and trail extensions and access road work and use.

### *Recommendation*

We recommend that the final GMP/EIS provide additional discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS), and criteria pollutant non-attainment areas in or near the park. The analysis of air quality should estimate emissions of pollutants, discuss the timeframe for release of these emissions and specify sources. The potential impacts to air quality (including cumulative and indirect impacts) from construction and operation activities should also be analyzed. We also recommend development of an Equipment Emissions Mitigation Plan that identifies actions to reduce diesel emissions, particulates, carbon monoxide, hydrocarbons, and NO<sub>x</sub> associated with construction activities.

### **Easements and land exchanges**

The GMP/DEIS indicates that under the Preferred Alternative, the NPS would extend the park boundaries by acquiring lands now owned by Washington State, BLM, and other private landowners (p. 66).

### *Recommendation*

We recommend the final GMP/EIS include information about the status of easement agreements and land acquisition, and show resulting alterations in park boundary locations, preferably with a map.

### **Tribal consultations**

Since information in the GMP/DEIS indicates that throughout the park, there are many cultural sites with resources associated with native tribes, it is possible that the proposed management plan could have impacts on tribal resources.

### *Recommendation*

We recommend that the final GMP/EIS include a discussion about the consultations NPS has had with Tribes potentially impacted by the proposed action, their outcomes, and a discussion of how issues raised in the consultations with Tribes were addressed.

### **Park User Capacity**

The draft GMP/EIS indicates that no visitor use management plan currently exists at the park (p. 68), and that a workshop addressing the topic was held in October of 2005. The document also reveals that the results of this workshop are on file at the park.

### *Recommendation*

EPA recommends that a summary of the workshop results be included in the final GMP/EIS along with a discussion of the impacts increased user capacity may cause to park resources. If the impacts are adverse and significant, then we recommend that the final GMP/EIS indicate how they will be minimized or mitigated.

Based on our concerns about potential adverse impacts to water and air quality and incomplete information, we have assigned a rating of EC-2 (Environmental Concerns-Insufficient Information) to the GMP/DEIS. An explanation of this rating is enclosed.

Thank you for the opportunity to review this GMP/DEIS. If you have questions or comments concerning our review, please contact Theo Mbabaliye at (206) 553-6322 or me at (206) 553-1601.

Sincerely,

/s/

Christine B. Reichgott, Manager  
NEPA Review Unit

Enclosures

cc: EPA Washington Operations Office  
The Lummi Tribe